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December 16, 2003

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**BY HAND**

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications  
and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: Fitchburg Gas and Electric Light Company; EC 03-3

Dear Ms. Cottrell:

Enclosed, please find Fitchburg Gas and Electric Light Company's responses to  
the Department's Second Set of Data Requests in Docket EC 03-3.

Thank you for your attention to this matter.

Very truly yours,

  
Meabh Purcell

MP:rtm

Enclosures

cc: Caroline M. Bulger, Hearing Officer (1 copy)  
Miguel Maravi (4 copies)  
Robert Sydney, General Counsel, DOER (1 copy)  
Wilner Borgella, Assistant Attorney General (1 copy)  
Ted Bohlen, Assistant Attorney General (1 copy)  
Paul Muzyka, PGM Plastics (1 copy)  
Michael Lanava, Executive Director (1 copy)

Commonwealth of Massachusetts  
Department of Telecommunications and Energy  
Fitchburg Gas and Electric Light Company  
Docket No: EC 03-3  
Department's Second Set of Information Requests

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**Request No.: DTE-2-1**

Please refer to the Letter. Explain in detail why each and every redacted item is confidential.

**Response:**

Upon further consideration by FG&E, and in discussion with PGM Plastics, Inc. ("PGM"), both parties have agreed to disclose all information for which confidential treatment had been sought in the October 31, 2003 filing, except as follows:

1. Number of persons employed by PGM (in original cover letter and on page 1 of PGM affidavit)
2. Total annual wages and benefits of PGM (in original cover letter)
3. Annual purchases of goods and services paid into the community by PGM (in original cover letter)
4. Specific language redacted on pages 1 and 9 of the special contract
5. List of PGM's customers on page 1 of PGM affidavit
6. Energy cost information on page 2 of PGM affidavit

Accordingly, under separate cover FG&E is submitting a revised filing disclosing all other information previously requested to be protected from public disclosure. In this submission, FG&E made one structural change to the original cover letter so that it no longer contains any confidential information. Specifically, FG&E has removed the detailed confidential information referenced in items 1, 2, and 3, above, and moved them to a new attachment to the filing: Attachment 5 – Confidential. FG&E is also submitting an addendum to the contract to memorialize these changes to the confidentiality agreement between FG&E and PGM.

With respect to the request for confidential treatment for the remaining PGM-related specific information, FG&E submits that these provisions should be protected from public disclosure because this information is competitively sensitive information concerning PGM's business plans and strategies. As stated in the revised cover letter, PGM is engaged in a highly competitive business. PGM's employment numbers, annual wages and benefits, annual purchases of goods and services paid into the community by PGM, PGM's customer list, energy cost information on page 2 of the affidavit and other redacted information on pages 1 and 9 of the contract is information normally not disclosed by PGM, and PGM takes steps to protect this information from public disclosure. This information reveals data and detail concerning PGM's costs and cost structure and may enable PGM's competitors to use this normally undisclosed information to PGM's disadvantage. FG&E submits that this information is well within the scope of "confidential, competitively sensitive or other proprietary information" contemplated by G.L. c. 25, § 5D, and accordingly, should be protected from public disclosure.

**Person Responsible:** Karen M. Asbury

Commonwealth of Massachusetts  
Department of Telecommunications and Energy  
Fitchburg Gas and Electric Light Company  
Docket No: EC 03-3  
Department's Second Set of Information Requests

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**Request No.: DTE-2-2**

Please refer to the Special Contract and its attachments. Explain in detail why each and every redacted item is confidential.

**Response:**

Please see response to DTE-2-1.

**Person Responsible:** Karen M. Asbury